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March 14, 2016

VIA ECF AND
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Hon. A. Kathleen Tomlinson
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722

Re: ***Bridgelal, et al. v. NY Renaissance Corp., et al.*** **(Case No. 15-cv-3571) (ADS) (AKT)**

Hon. Judge Tomlinson:

We represent defendants NY Renaissance Corp., Dan Pirvulescu and Monique Delacroix ("Defendants") in the above entitled action. Pursuant to Rule I.D of Your Honor's Individual Practices, we write to respectfully request a one (1) week extension of time for Defendants to file their motion for partial declaratory judgment that Plaintiff Belliard is an exempt employee, and a corresponding one (1) week adjournment of Plaintiffs' deadline to oppose said motion.

Pursuant to the November 19, 2015 Civil Conference Minute Order [DE 43], the deadline for Defendants moving papers in connection with the above referenced motion is tomorrow March 15, 2016, Plaintiffs' opposition is currently due on or before April 6, 2016 and Defendants reply is currently due on or before April 22, 2016.

Defendants are respectfully requesting that the moving and opposition deadlines be adjourned one (1) week i.e. that Defendants' deadline to file the motion be extended to March 22, 2016, correspondingly that Plaintiffs' opposition be due on or before April 13, 2016, and that Defendants' reply remain due on April 22, 2016, so that the motion can still be fully submitted on that date.

The reason for this request is that neither party has received the transcripts from the depositions of Mr. Belliard or Defendant NY Renaissance Corp. Due to scheduling conflicts between the parties and their counsel, the depositions were taken later than anticipated. NY Renaissance Corp., was deposed on March 3, 2016 and Mr. Belliard was deposed on March 9, 2016. Defendants plan to utilize both deposition transcripts in the upcoming motion, and as such are requesting a brief extension. Both parties anticipate receiving copies of the transcripts this week.

This is Defendants' first request for an adjournment of the briefing schedule on this motion. Counsel for both parties have consented to the above extended briefing schedule.

We appreciate Your Honor's time and consideration in this matter and should you need any further information, we are available at the Court's convenience.

Respectfully submitted,

ADELMAN MATZ, P.C.

Sarah M. Matz, Esq.

Cc: *(Via ECF)*
Brent E. Pelton, Esq.
Taylor B. Graham, Esq.